

SUPPLEMENT TO PETITION FOR A WRIT OF HABEAS CORPUS

1. Petitioner Azadeh Dehghani is currently detained at the Otero Processing Center, located at 26 McGregor Range Road, Chaparral, New Mexico 88081.
2. Petitioner was issued and Expediated Removal Order alleging that she was not admissible into the United States under Section 212 (a) (7) (A) (i) (I) of the Immigration and Nationalit Act as an alien who lackc valid entry documents.
3. Petitioner contends that she has proper documents to enter the United States and that she also has the proper documents to support her admission as a TN visa holder.

FACTUAL BACKGROUND

4. Petitioner **Azadeh Dehghani** has **TN nonimmigrant status (TN NAFTA Professionals)**, a visa classification available under the United States-Mexico-Canada Agreement (USMCA).
5. Petitioner's TN status was nearing its expiration, and she traveled from Dallas, Texas, to Nuevo Laredo and went to its port of entry to renew her status in order to be in compliance with United States Immigration Laws.
6. At the Laredo, Texas Port of Entry, Customs and Border Protection (CBP) officers requested additional documentation, including a more recent work notification verifying Petitioner's continued employment with her sponsoring employer.
7. Petitioner then returned to Dallas to obtain the required updated employment information. In order to expedite her return to a port of entry, her husband purchased a flight to El Paso, Texas, thus allowing her to avoid driving long distances.
8. By the time Petitioner presented herself at Ysleta Port of entry in El Paso, Texas to renew her TN status her TN status had been expired for five days.
9. Petitioner then presented her documents including her employment information and valid Canadian passport and requested to be admitted in TN status. Its important to note that Canadian citizens are allowed to request TN status without first having obtained a visa. Despite her good-faith efforts to comply with admission requirements, CBP officers verified her information and then detained her. It was at this time that an Expediated Order of Removal was issued against Petitioner.
10. During her detention, Petitioner was initially interviewed by a female inspector who

appeared to misunderstand the requirements for TN status, including its availability exclusively to Canadian citizens at a Port of Entry.

11. Petitioner was then taken into custody and remanded to the custody of Immigration and Customs Enforcement.
12. Petitioner has been in custody since December 26, 2024.